

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

TAMMY DeCOSTA,) CASE NO. 1:19 cv 01584
vs.)
Plaintiff,) JUDGE BENITA Y. PEARSON
vs.)
Defendants.) **JOINT STATUS REPORT**
CUYAHOGA COUNTY, OHIO, et al.,)
vs.)
Defendants.)

Pursuant to the Court's February 13, 2020 Order staying this case, the parties hereby submit the following Joint Status Report.

The Defendants continue to identify and request Plaintiff's records from medical providers who have treated her both prior to and following the incidents that are the subject of Plaintiff's Complaint. Some records have been produced, but the Defendants continue to seek records from other providers. The Defendants also have served written discovery seeking various documents identified by Plaintiff during her deposition. The Defendants also seek to obtain recent medical records documenting Ms. Decosta's current treatment and level of disability.

The following depositions have been conducted:

Defendant, Thomas Tallman, D.O. – August 26, 2020;

Defendant, Sheriff Clifford Pinkney – September 11, 2020;

Gary Brack – September 15, 2020; and

Plaintiff, Tammy Decosta – September 21, 2020.

Currently, no further depositions have been set. Plaintiff is expected to depose Margaret Keenan and nurse McCord Sumlin in the early part of 2021. Plaintiff's counsel is in the process of gathering more documents from the Ohio Attorney General through subpoena and public record requests in the early part of 2021.

The criminal prosecution of co-Defendant, Kenneth Mills, *State v. Mills* No. CR-19-645266-A remains pending with jury trial set to commence on February 16, 2021.

Respectfully submitted,

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